

BILL OF COMPLAINT

Dorothy Heffner Stroup and
Harry Stroup, her husband,
Betty May Heffner Geisbert
and Louis William Geisbert,
her husband.

vs.

Charles E. Heffner and George
F. Heffner, infants

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No. 16177 Equity.

In the Circuit Court

for Frederick County.

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Dorothy Heffner Stroup and Harry Stroup, her husband, Betty May Heffner Geisbert and Louis William Geisbert, her husband, respectfully represents unto your Honorable Court:

FIRST: That on the 9th day of October, 1933, a certain Elmer U. Heffner conveyed the hereinafter described tract of real estate unto Dorothy Heffner, Betty May Heffner, now Geisbert, Charles E. Heffner and George F. Heffner, as tenants in common, said deed being recorded in Liber No. 388, folio 457, one of the Land Records for Frederick County.

SECOND: That the said Dorothy Heffner has now intermarried to Harry M. Stroup, and the said Betty May Heffner has now intermarried with Louis William Geisbert; that the said Charles E. Heffner is now eighteen years of age, and the said George F. Heffner is twenty years of age.

THIRD: That the real estate mentioned in said deed amounts to nine acres, two roods and thirty-eight square perches, and being the same parcel of land conveyed to Elmer U. Heffner by deed from Frank E. Koontz and Clara E. Koontz, his wife, dated March 30, 1921, and recorded in Liber No. 335, folio 211, one of the Land Records for Frederick County.

FOURTH: That the first above mentioned deed is filed herewith marked Exhibit No. 1 and it is prayed may be taken and considered a part hereof.